

REMARKS

Claims 1-3 and 6-25 are pending in the current application. Claims 1, 3, 6, and 16-25 are currently amended.

Specification

The Examiner asserts the term “computer-readable medium” constitutes new matter. Though Applicants do not necessarily agree, for the purpose of furthering prosecution, the term “computer-readable medium” has been removed.

Claim Rejections – 35 U.S.C. § 101

Claims 16-24 stand rejected under 35 U.S.C. § 101 because the claims are directed to non-statutory subject matter.

The Examiner asserts the term “computer-readable medium” constitutes new matter, and therefore, treats the term as referencing a signal. Though Applicants do not necessarily agree, for the purpose of furthering prosecution, the term “computer-readable medium” has been removed and replaced by the originally filed language “recording medium”. Applicants respectfully submit, the term “recording medium” does not reference a signal, and is clearly directed to statutory subject matter.

Therefore, Applicants respectfully request the rejection of claims 16-24 under §101 be withdrawn.

Claim Rejections – 35 U.S.C. § 102

Claim 25 stands rejected under 35 U.S.C. § 102(e) as being anticipated by Kim (US 6,754,435, hereinafter “Kim”).

Claim 25 recites “reading graphic link information stored in a first file on the recording medium, the graphic link information linking a graphic image **stored in a**

second file separate from the first file with a plurality of main video images”. Kim fails to teach this limitation. On page 4 of the March 18, 2009 Office Action, the Examiner asserts Kim teaches that the navigation pack, audio pack, video pack, and sub-picture illustrated in FIG. 4 of Kim are separate files as claim 1 recites. Applicants respectfully disagree. Nothing in Kim teaches or suggests that the navigation pack, audio pack, video pack, and sub-picture are separate **files**. To the contrary, Kim states that the navigation pack, audio pack, video pack, and sub-picture are each pieces of data within a single VOB (Kim: col. 3, ln. 61-66). Further, Kim states that the navigation pack, audio pack, video pack, and sub-picture are each **multiplexed** within the VOB (Kim: col. 3, ln. 58-60). Accordingly, Kim specifically teaches that the navigation pack, audio pack, video pack, and sub-picture are each intertwined into a single VOB. Thus, Kim not only fails to provide support for the Examiner's assertion that the packs illustrated in FIG. 4 are each separate files, Kim specifically teaches the packs are not separate.

Therefore, Applicants respectfully request the rejection of claim 25 under 35 U.S.C. §102 be withdrawn.

Claim Rejections – 35 U.S.C. § 103

Claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Kim and further in view of Burgess et al. (US 7,110,137, hereinafter “Burgess”).

Claim 1 recites: “wherein the graphic link information and the plurality of graphic images are stored in separate files”. Applicants respectfully submit, for at least the same reasons discussed above with respect to claim 25, Kim fails to teach this limitation. Burgess likewise fails to teach this limitation. Accordingly, neither Kim, nor Burgess, alone or in combination teach each of the limitations of claim 1.

Consequently, the Examiner cannot establish a prima facie case of obviousness with respect to claim 1 as is required to support a rejection under §103.

Therefore, Applicants respectfully request the rejection of claim 1 under 35 U.S.C. §103 be withdrawn.

Claims 6, 16, 2, 3, 15, 24, 8, 18, 9, 19, 10, 20, 11, 21, 12, 13, 14, 22, and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kim and Burgess as applied to claim 1 above, and further in view of Ochiai et al. (US 2005/0180734, hereinafter "Ochiai").

Claims 6 and 16

First, claim 6 recites "wherein the graphic image file is separate from the graphic link information file". Applicants respectfully submit, for at least the same reasons discussed above with respect to claim 1, Kim and Burgess fail to teach this limitation. Ochiai likewise fails to teach this limitation.

Next, claim 6 recites "placing the graphic image file and the graphic link information file under a specific directory defined by a file structure of the recording medium or under at least one subdirectory created below the specific directory" The Examiner admits, on page 7 of the March 18, 2009 Office Action, that neither Kim nor Burgess teach this limitation. The Examiner then asserts that FIG. 9 and paragraph [0159] of Ochiai teach this limitation. Applicants respectfully disagree. Applicants note FIG. 9 illustrates what appears to be a file structure including directories. However, nothing in paragraph [0159] or FIG. 9 of Ochiai teaches graphic link information. Thus, Ochiai is completely silent with respect to the relative storage locations of graphic link information and a graphic image file. Accordingly, Ochiai

cannot teach “placing the graphic image file **and** the graphic link information file **under a specific directory**” as claim 6 recites.

Accordingly, for at least the reasons stated above, none of Kim, Burgess, or Ochiai, alone or in combination teach each of the limitations of claim 6. Consequently, the Examiner cannot establish a *prima facie* case of obviousness with respect to claim 6, or any claims depending from claim 6, as is required to support a rejection under §103.

Further, claim 16 contains limitations at least somewhat similar to those of claim 6. Accordingly, for at least the reasons stated above with respect to claim 6, none of Kim, Burgess, or Ochiai, alone or in combination teach each of the limitations of claim 16. Consequently, the Examiner cannot establish a *prima facie* case of obviousness with respect to claim 16, or any claims depending from claim 16, as is required to support a rejection under §103.

Claims 2-3

First, the deficiencies of Kim and Burgess are discussed above and re relevant here as well because claims 2 and 3 depend from claim 1. Accordingly, for at least the reasons discussed above with respect to claim 1, Kim and Burgess fail to teach each of the limitations of either of claims 2 and 3. Ochiai fails to remedy these deficiencies. Accordingly, none of Kim, Burgess, and Ochiai, alone or in combination, teach each of the limitations of either of claims 2 and 3.

Next, claim 2 recites “wherein said plurality of graphic images and graphic link information are grouped based on said main video image”. With respect to this limitation, the Examiner references paragraphs [0158]-[0159] of Ochiai. The Examiner then appears to assert that aforementioned limitation reads on a subdirectory taught by Ochiai because the subdirectory is for grouping. Applicants respectfully disagree.

Even if, as the Examiner asserts, Ochiai teaches a subdirectory for grouping, nothing in Ochiai, Kim or Burgess teaches grouping graphic images and graphic link information **based on the main video image**, the main video image being the image to which the graphic images are linked by the graphic linking information as claim 1 recites. Further, Ochiai doesn't even mention graphic link information. Accordingly, Ochiai is completely silent with respect to the manner in which graphic link is grouped in subdirectory. For at least these reasons, the combination of Kim, Burgess and Ochiai clearly fails to teach each of the limitations of claim 2.

Therefore, Applicants respectfully request the rejections of claims 16, 2, 3, 15, 24, 8, 18, 9, 19, 10, 20, 11, 21, 12, 13, 14, 22, and 23 under 35 U.S.C. §103 be withdrawn.

Claims 7 and 17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kim, Burgess, and Ochiai, as applied to claims 6, 16, 2, 3, 15, 24, 8, 18, 9, 19, 10, 20, 11, 21, 12, 13, 14, 22, and 23 above, and further in view of Russ (US 5,446,857, hereinafter "Russ").

The deficiencies of Kim and Burgess and Ochiai are discussed above and are relevant here as well because claim 7 depends from claim 1, and claim 17 depends from claim 16. Accordingly, for at least the reasons discussed above with respect to claims 1 and 16, Kim and Burgess fail to teach each of the limitations of either of claims 7 and 17. Ochiai fails to remedy these deficiencies. Accordingly, none of Kim, Burgess, Ochiai, and Russ, alone or in combination, teach each of the limitations of either of claims 7 and 17. Consequently, the Examiner cannot establish a *prima facie* case of obviousness with respect to either of claims 7 and 17 as is required to support a rejection under §103.

Therefore, Applicants respectfully request the rejection of claim 7 and 7 under 35 U.S.C. § 103 be withdrawn.

CONCLUSION

Accordingly, in view of the above amendments and remarks, reconsideration of the objections and rejections and allowance of each of claims 1-3 and 6-25 in connection with the present application is earnestly solicited.

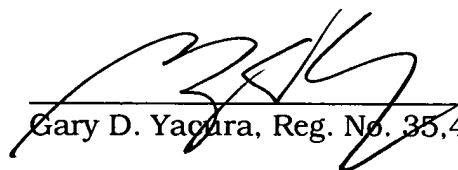
Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Gary D. Yacura at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. §1.17; particularly, extension of time fees.

Respectfully submitted,

HARNESS, DICKEY, & PIERCE, P.L.C.

By



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